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**PACIFIC WOOD TREATING
CORPORATION**

24 July 1990

Marcia Bailey, EPS
RCRA Compliance Section
U.S. EPA Region X
1200 Sixth Ave.
Seattle WA 98101

Dear Dr. Bailey:

I have discussed with you and with David Croxton, the potential for removing the leachate arising at the RBT landfill, from RCRA regulation by demonstrating that it passes the health based criteria listed in chapter 8 of the RCRA Facility Invest. document. For substances with criteria below the detection limit, I understand from conversation with Carrie Sikorski, that the Practicable Quantitation Limit (PQL) may be used as the qualifying level.

Accordingly in addition to prior analytical data already obtained we have just had the leachate analyzed for those constituents peculiar to the wood preserving pesticides and which are also listed in the RFI document as systemic toxicants and carcinogens.

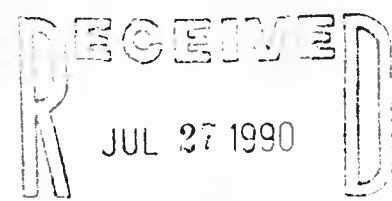
Table I gives the results of this investigation with chain of Custody and Laboratory reports. You will note that we have had the testing done at two different laboratories for each constituent of concern. In addition I have included results from the sampling done on May 23, 1988 by Tetra Tech and Dave Newton (Table II). Finally the results obtained over the past 7 years are included in table III. (I realize you have the information in the latter two tables in your office).

All constituents in all cases are either below the detection limit or below the health based criteria for concern. This data is submitted with the request and petition that the EPA remove this water from RCRA regulation because it passes the health based criteria.

Sincerely,

Bryant L Adams

Bryant L. Adams, Ph.D
Environmental Engineer



WASTE MANAGEMENT BRANCH